

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

IN RE: South Carolina Energy Freedom)	
Act (House Bill 3659) Proceeding)	
Related to S.C. Code Ann.)	
Section 58-37-40 and Integrated)	DOCKET NO. 2019-226-E
Resource Plans for Dominion)	
Energy South Carolina,)	
Incorporated)	

**South Carolina Coastal Conservation League and Southern Alliance for Clean
Energy's
First Request for Production of Documents to Dominion Energy South Carolina,
Inc.**

Pursuant to S.C. Code Ann. Regs. 103-833 and the South Carolina Rules of Civil Procedure, the South Carolina Coastal Conservation League, the Southern Alliance for Clean Energy, and Upstate Forever, by and through its undersigned counsel, hereby request that Dominion Energy South Carolina, Inc. ("DESC") respond to this First Request for Production of Documents separately and fully, under oath, and in writing within twenty (20) days of the date of service hereof to the offices of Katherine Lee, Southern Environmental Law Center, 525 East Bay Street, Suite 200, Charleston, SC 29403 and, where feasible, electronically to klee@selcsc.org.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.

2. That all responses to the below First Request for Production of Documents shall be labeled using the same numbers as used herein.

3.

4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That each Request for Production of Documents be reproduced at the beginning of the response thereto.

6. That, in addition to the signature and verification at the close of DESC's responses, DESC's witness(es) responsible for the information contained in each response also be indicated.

7. That DESC provide the undersigned with responses to the Request for Production of Documents as soon as the responses are available to be produced but not later than twenty (20) days from the date of service hereof.

8. If the response to any Request for Production of Documents is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production of Documents shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

10. If a privilege not to produce a document is claimed, identify each document as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

11. If a refusal to answer a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of person hours and costs required to conduct the search.

12. Answer each Request for Production of Documents on the basis of the entire knowledge of DESC, including information in the possession of DESC, its officers, directors, consultants, representatives, agents, experts, and attorneys, if any.

13. If any Request for Production of Documents cannot be answered in full, answer to the extent possible and specify the reasons for DESC's inability to answer.

DEFINITIONS

1. The terms “DESC,” “the Company,” “You,” and “Your” where used in these Interrogatories and Requests for Production of Documents refers to Dominion Energy South Carolina, Inc., together with its employees, agents, consultants, experts, subsidiaries, affiliates, and other operational or functional units and all officers, directors, owners, members, employees, agents and representatives of these entities. It also includes all other persons acting on behalf of Dominion Energy South Carolina, Inc..

2. “Document” and “documents” shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, work papers, books, records, letters, photographs, correspondence, communications, electronic mail, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jotting, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined

in Rule 34 of the South Carolina Rules of Procedure of any kind in your possession, custody or control or to which you have access or know to exist.

3. “Relate,” “relating,” “relating to,” and “related to” when used in these Interrogatories shall mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the interrogatory, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

4. “Identify” or “identity” used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the time in question. If the person was an officer, director, trustee, commissioner, or employee of DESC, also state the job title and areas of responsibility.

5. “Identify” or “identity” used with reference to a writing means to state the date, author, type of document (*e.g.*, letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in DESC’s possession or subject to its control, state what disposition was made of it.

6. “Address” means home address, mailing address, school address, and business address.

7. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories any information which might otherwise be construed outside their scope.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please provide copies of data requests, formal discovery requests, and interrogatories served by any other parties in this docket. Where available, please provide copies electronically in the native file format. Please consider this an ongoing request.
2. Please provide copies of any responses to data requests, formal discovery requests, and interrogatories served by any other parties in this docket. Where available, please provide copies electronically in the native file format. Please consider this an ongoing request.

May 11, 2020

Respectfully submitted,

s/Katherine Lee

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